# CHECKLIST ENVIRONMENTAL ASSESSMENT

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| **Project Name:** | Balko Oil Production Comingling for Lease OG – 43862-20 |
| **Proposed Implementation Date:** | Fall 2022 |
| **Proponent:** | Balko Inc. |
| **Location:** | S1/2 of Section 36, T28N., R5W. |
| **County:** | Pondera |
| **Trust:** | Common Schools |

## I. TYPE AND PURPOSE OF ACTION

Balko Inc. (Balko) proposes to comingle the oil production from oil wells located on state land to a tank battery site located on adjacent private land, referred to herein as the "Project". To comingle oil production, the Project requires the installation of a flowline and the deconstruction of an existing tank battery site located on state land which will result in approximately 0.5 acres of soil disturbance. The wells, Montana A-4 and Montana A-2 of lease # OG-43862-20, from which oil is produced are located on state land (lease # 4906) and are referred herein as "A-4 & A-2". The proposed tank battery, in which, the state-produced oil will comingle with oil from private wells, is located on adjacent private land under Balko's private oil production lease and is referred to herein as "Kellogg Tank Battery". The tank battery site that is proposed for deconstruction is located on a residential state lease (residential lease # 5429) and is referred to herein as "State Tank Battery". See **Attachment A**, Project Location Map. Comingling oil production from A-4 & A-2 wells with private wells, through the installation of a flowline to the Kellogg Tank Battery, will allow production to come online more quickly, reduce ground disturbance and traffic on lease # 4906 and residential lease # 5429, and result in a longer production life for lease # OG-43862-20. In addition, the deconstruction of the State Tank Battery will reduce the potential for oil spills and increase the overall aesthetics of lease # 4906 and residential lease # 5429.

## II. PROJECT DEVELOPMENT

### 1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED:

*Provide a brief chronology of the scoping and ongoing involvement for this project.*

The Project is located on state-owned land and privately owned land and Balko is the proponent. Agencies involved in the permitting process include the Montana Department of Natural Resources and Conservation, (DNRC) - Trust Land Management Division - Minerals Management Bureau, and the Montana Board of Oil and Gas Conservation (MBOGC).

Ag & Grazing: Surface Lessee – Lease # 4906 – William H. McKinley
Residential: Surface Lessee – Resendital Lease # 5429 – Gib K. McKinley

### 2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:

The Project will be permitted under lease # OG-43862-20.

### 3. ALTERNATIVES CONSIDERED:

**Alternative A (No Action Alternative):** Deny Balko permission to comingle oil production through the installation of a flowline and deconstruction of the State Tank Battery.

**Alternative B (Proposed Action):** Grant Balko permission to comingle oil production through the installation of a flowline and deconstruction of the State Tank Battery.

## III. IMPACTS ON THE PHYSICAL ENVIRONMENT

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

### 4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:

*Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify any cumulative impacts to soils.*

**Soil Properties:**
There are three types of soils found within the Project footprint.

***(400) Havre-Fairway loams 0 to 4 percent slopes, rarely flooded:***
These soils consist of very deep (more than 80 inches), well-drained (Havre), and somewhat poorly drained (Fairway) soils. These soils are found within flood plains. Available water supply, 0 to 60 inches is about 9.7 inches (Havre) and about 9.0 inches (Fairway); the mean annual precipitation for the region is 12 to 14 inches (Soil Survey of Choteau-Conrad Area Parts of Teton and Pondera Counties Montana, 2003).

***(403) Haploborolls-Argiborolls complex, 0 to 4 percent slopes, rarely flooded:***
These soils consist of very deep (more than 80 inches), somewhat poorly drained (Haplobrolls) and well-drained (Argiborolls) soils. These soils are found within flood plains. Available water supply, 0 to 60 inches is about 6.0 inches (Haploborlls) and about 9.5 inches (Argiborolls); the mean annual precipitation for the region is 12 to 19 inches (Soil Survey of Choteau-Conrad Area Parts of Teton and Pondera Counties Montana, 2003).

***(477C) Marmarth-Evanston-Delpoint complex, 2 to 15 percent slopes:***
These soils consist of moderate (20 to 40 inches to paralithic bedrock) and deep (more than 80 inches to restrictive feature), well-drained soils. These soils can be found within hills and alluvial fans. Available water supply, 0 to 60 inches is about 4.2 inches (Marmarth), about 10.1 inches (Evanston), and about 4.1 inches (Delpoint); the mean annual precipitation for the region is 11 to 14 inches (Soil Survey of Choteau-Conrad Area Parts of Teton and Pondera Counties Montana, 2003).

**Soil Stability:**

***K-Factor:***
Soils identified within the Project footprint have a Soil Erodibility (K) Factor of 0.24 to 0.32 (Soil Survey of Choteau-Conrad Area Parts of Teton and Pondera Counties Montana, 2003). The K Factor range is 0.02 to 0.69 (0.69 being the most susceptible to sheet and rill erosion by water). The K Factor is moderate for the Project site which indicates a moderate susceptibility to erosion by water.

***Wind Erodibility Group:***
Soils identified with the Project footprint have a Wind Erodibiltiy Group (WEG) of 4 – 6 (Soil Survey of Choteau-Conrad Area Parts of Teton and Pondera Counties Montana, 2003). The WEG range is 1 – 8 (1 being the most susceptible to wind erosion and 8 being the least susceptible). The WEG is low to moderate for the Project site which indicates a low to moderate susceptibility to erosion by wind.

**Suitabilities and Limitations for Use:**

***Shallow Excavations:***
Project installation of the flowline would occur within soil type 477C while Project deconstruction of the State Tank Battery would occur within soil types 400 and 403. All three soil types were identified as "somewhat limited" which indicates the soils have features that are moderately favorable for shallow excavations. NRCS indicates that "The limitations can be overcome or minimized by special planning, design, or installation" (Soil Survey of Choteau-Conrad Area Parts of Teton and Pondera Counties Montana, 2003).

***Corrosion of Steel:***
Project installation of the flowline would occur within soil type 477C. This soil was identified as having a low risk of corrosion on steel (Soil Survey of Choteau-Conrad Area Parts of Teton and Pondera Counties Montana, 2003).

**BMPs:**
Balko proposes to strip and stockpile the topsoil from excavation activities, to be used for reclamation purposes. As part of the stipulations under lease # OG-43862-20, the DNRC will require Balko to re-seed the disturbed area with a seed mixture approved by the DNRC – Conrad Unit Office.

**Determination:**
Effect, Not Likely to Adversely Effect. The Project has the potential to impacts soils, however, given its low to moderate susceptibility to erosion, suitability for excavations, low risk of corrosion on steel, and the implementation of the BMP's described above, the Project is not expected to have negative cumulative effects on soil.

**5. WATER QUALITY, QUANTITY AND DISTRIBUTION:**
*Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify cumulative effects to water resources.*

**Surface or Groundwater Resources:**
Pondera Coulee is located adjacent to the Project and flows east towards the Marias River. There are no diversion points for irrigation and/or stock located within the Project. There is one known Point of Diversion (POD) located approximately 350 feet northwest of the Project under Water Rights Number 41P 13757000. The Project falls within Places of Use (POUs) under Water Rights Numbers 41O 17803900 (stock) and 41O 17804000 (domestic), for additional information see http://wrqs.dnrc.mt.gov/ResultsWS.aspx?search=advanced&index=4&status=ACTV!SEVR&trs=28N5W&section=36

**Determination:**
Effect, Not Likely to Adversely Effect. The Project has the potential to impact Pondera Coulee through stormwater runoff of disturbed soils. However, given the estimated disturbance acreage (≈ 0.5 acres), the Project is not expected to have negative cumulative effects on water quality.

**6. AIR QUALITY:**
*What pollutants or particulate would be produced? Identify air quality regulations or zones (e.g. Class I air shed) the project would influence. Identify cumulative effects to air quality.*

**Air Quality:**
There are no Nonattainment areas located on or near the Project, per the Environmental Protection Agency (EPA) Nonattainment area maps (NEPAssist, 2021). The proposed activities will not result in any new air emissions.

**Determination:**
No Effect. It is not anticipated that the Project would result in negative cumulative effects on air quality.

**7. VEGETATION COVER, QUANTITY AND QUALITY:**
*What changes would the action cause to vegetative communities? Consider rare plants or cover types that would be affected. Identify cumulative effects to vegetation.*

**Vegetative Community:**
Vegetation on the Project site around A-4 & A-2 wells consists of an old Conservation Reserve Program (CRP) grass mix of Smooth Brome (*Bromus inermis*), Crested Wheatgrass (*Agropyron cristatum*), Slender Wheatgrass (*Agropyron trachycaulum*), Intermediate Wheatgrass (*Agropyron intermedium*), and Alfalfa (*Medicago sativa*). Vegetation on the Project site around the State Tank Battery consists mainly of "tame" grasses with some native grasses. The "tame" grasses consist of Meadow Foxtail (*Alopecurus pratensis*), Smooth Brome (*Bromus inermis*), Kentucky Bluegrass (*Poa pratensis*), and Crested Wheatgrass (Agropyron cristatum), the native grasses consist of Western Wheatgrass (*Pascopyrum smithii*), Green Needlegrass (*Nassella viridula*), Sandberg

Bluegrass (*Poa secunda*), sedges/rushes (*Carex/Juncus*), and Common Snowberry (*Symphoricarpos albus*). Noxious weeds were not reported within the Project footprint. The Natural Heritage Program database did not indicate any plant species of concern within Township 28N Range 5W.

**BMPs:**
Compliance with lease # OG-43862-20 will require Balko to replace topsoil, re-seed with a native seed mix, and monitor for noxious weeds. The recommended re-seeding mix shall consist of 35% Intermediate Wheatgrass *(Agropyron intermedium),* 35% Pubescent Wheatgrass (*Thinopyrum intermedium*), 20% Tall Wheatgrass (*Thinopyrum ponticum*), and 10% Alfalfa (*Medicago sativa*) or Sanfoin (*Onobrychis sativa*). The mix shall be Certified Noxious Weed Seed Free, drilled at a seeding rate of 8 lbs/acre Pure Live Seed (PLS), if broadcast seeding, poundage shall be doubled and harrowed, and seeding shall occur either in the fall (after September 15) or early spring (before May 1).

**Determination:**
Effect, Not Likely to Adversely Effect. Project activities will result in a temporary disturbance of the vegetative community within the Project footprint. The BMPs proposed above will mitigate any long-term adverse effects and therefore negative cumulative effects on vegetative resources are not expected.

**8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:**
*Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify cumulative effects to fish and wildlife.*

**Habitat:**
The Project site is not considered Critical Habitat per the EPA. The surrounding area provides habitat for a variety of big game species, predators, upland game birds, other non-game mammals, birds of prey, and various songbirds.

**BMPs:**
Compliance with lease # OG-43862-20 will require Balko to replace topsoil, re-seed with a native seed mix, and monitor for noxious weeds. Deconstruction of the State Tank Battery will reduce the potential for oil spills and thus reduce adverse impacts to the surrounding habitat.

**Determination:**
Effect, Not Likely to Adversely Effect & Beneficial Effect. The Project has the potential to impact wildlife temporarily through the operation of heavy equipment during actual construction days. However, there is also potential for a long-term beneficial impact on wildlife through the reduction of adverse environmental impacts by oil spills through the removal of the State Tank Battery. Overall, the Project is not expected to have negative cumulative effects on wildlife or habitat.

**9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:**
*Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify cumulative effects to these species and their habitat.*

**Species of Concern/Threatened/Endangered:**
Federally listed species that occur in Pondera County, Montana include Grizzly Bear (*Ursus arctos horribilis*), Canada Lynx (*Lynx canadensis*), Piping Plover (*Charadrius melodus*), Monarch Butterfly (*Danaus plexippus*), and Whitebark Pine (*Pinus albicaulis*).

The National Heritage Program database identifies Ferruginous Hawk (*Buteo regalis*) as a species of concern within Township 28N, Range 5W.

**Wetlands:**
The National Wetland Inventory identifies a Freshwater Emergent Wetland habitat with a classification code of PEM1C approximately 350 northwest of the Project (Pondera Coulee); for a complete description of wetland classification codes, go to https://www.fws.gov/wetlands/data/Mapper.html.

**BMPs:**
Compliance with lease # OG-43862-20 will require Balko to replace topsoil, re-seed with a native seed mix, and monitor for noxious weeds. Deconstruction of the State Tank Battery will reduce the potential for oil spills and thus reduce adverse impacts to the surrounding habitat.

**Determination:**
Effect, Not likely to Adversely Effect & Beneficial Effect. The Project has the potential to impact identified species temporarily through the operation of heavy equipment during actual construction days. However, there is also potential for a long-term beneficial impact on wildlife through the reduction of adverse environmental impacts by oil spills through the removal of the State Tank Battery. Overall, the Project is not expected to have negative cumulative effects on wildlife or habitat.

**10. HISTORICAL AND ARCHAEOLOGICAL SITES:**
*Identify and determine effects to historical, archaeological or paleontological resources.*

**Historical and Archeological Sites:**
A Class I (literature review) level review was conducted by the DNRC staff archaeologist for the area of potential effect (APE). This entailed inspection of project maps, DNRC's sites/site leads database, land use records, General Land Office Survey Plats, and control cards. The Class I search revealed that no cultural or paleontological resources have been identified in the APE.

**Determination:**
Because the APE on state land was once cultivated, because the Holocene age soils in the APE are relatively thin, and because the local geology is not likely to produce caves, rock shelters, or sources of tool stone, no additional archaeological investigative work will be conducted in response to this proposed development. However, if previously unknown cultural or paleontological materials are identified during Project-related activities, all work will cease until a professional assessment of such resources can be made.

**11. AESTHETICS:**
*Determine if the project is located on a prominent topographic feature, or may be visible from populated or scenic areas. What level of noise, light or visual change would be produced? Identify cumulative effects to aesthetics.*

**Visual and Noise:**
The Project is located approximately 10 miles southwest of Conrad, Montana (population 2,633) and adjacent to Midway Road West and Hawkeye Road. The State Tank Battery is located approximately 580 feet from a home located on residential lease # 5429.

**BMPs:**
Compliance with the lease # OG-43862-20 will require Balko to replace topsoil, re-seed with a native seed mix, and monitor for noxious weeds.

**Determination:**
Effect, Beneficial Effect. The Project has the potential to have temporary noise impacts to the nearby homeowner/Lessee of residential lease # 5429 and persons traveling on Midway Road West and/or Hawkeye Road. However, in the long-term overall noise levels will be reduced since Balko (the operator) will no longer need to travel on lease # 4906 or residential lease # 5429 to collect produced oil. The removal of the State Tank Battery from the surface of residential lease # 5429 will also improve the overall aesthetic of the land. The Project is not expected to have negative cumulative effects on aesthetics.

**12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:**
*Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify cumulative effects to environmental resources.*

**Environmental Resource Demand:**
The A-4 & A-2 wells are expected to begin pulling oil from the Sun River Dolomite formation. The wells have been inoperable since 2016 when the State Tank Battery had an oil spill and the structural integrity was compromised and never restored. The wells are expected to resume normal oil production that had occurred before 2016.

**Determination:**
Effect, Not Likely to Adversely Effect. The Project has the potential to affect mineral resources through resuming normal operation of the A-4 & A-2 wells, however, oil production is not expected to have negative cumulative effects on environmental resources.

**13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:**
*List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur as a result of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.*

The land surrounding the A-4 & A-2 wells is owned by the state with a surface use of agriculture and grazing under lease # 4906. The land surrounding the State Tank Battery is owned by the state with the surface used for a residential homesite under residential lease # 5429. The land surrounding the Kellogg Tank Battery is owned by a private landowner with a surface use of agriculture and grazing. Any future development in the area will likely be restricted to utility or mineral development, with minimal impacts to the surface. Future development of projects is not expected to have negative cumulative effects.

## IV. IMPACTS ON THE HUMAN POPULATION

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

**14. HUMAN HEALTH AND SAFETY:**
*Identify any health and safety risks posed by the project.*

**Human Health and Safety:**
Personnel involved with Project activities include Balko Inc. personnel, where health and safety risks consist of the normal day-to-day operations of managing oil and gas wells, flowlines, and tank batteries.

**Determination:**
No Effect. Any risk to human health and safety will be restricted to Balko personnel during normal day-to-day operations of managing oil and gas wells, flowlines, and tank batteries and it is assumed Balko will abide by all Occupational Safety and Health Administration laws.

**15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:**
*Identify how the project would add to or alter these activities.*

**Land Use:**
The current land use on which A-4 & A-2 wells are located and where the flowline will be installed (lease # 4906) consists of 455.50 acres of hay land and 180.20 acres of grazing. The current land use on which the State Tank Battery is located (residential lease # 5429) consists of a 4.3-acre homesite. The current land use on which the Kellogg Tank Battery is located (private land) consists of hay land.

**Production:**
Due to the structural integrity of the State Tank Battery being compromised, the A-4 & A-2 wells have not produced oil since 2016. Allowing the oil production from the A-4 & A-2 wells to comingle with private oil production in the Kellogg Tank Battery will restore oil production on lease # OG-43862-20 and will have the royalty payments from production come online more quickly.

The annual rental fee for lease # OG-43862-20 is $1.50/acre/year for years 1- 5, $2.75/acre/year for year 6, and $4.00/acre/year for years 7-10 with the acres being 640. The royalty rate is at 16.67% on the average production of the oil from producing the A-4 & A-2 wells for each calendar month.

The Project will not impede production of the surface on lease # 4906 or residential lease # 5429.

**BMPs:**
Compliance with the lease # OG-43862-20 will require Balko to replace topsoil, re-seed with a native seed mix, and monitor for noxious weeds.

**Determination:**
Effect, Beneficial Effect. The Project will increase the overall production of lease # OG-43862-20, all while not impeding the existing production of the surface for lease # 4906 and residential lease # 5429. The Project is not expected to have negative cumulative effects on existing and future land activities.

**16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:**
*Estimate the number of jobs the project would create, move or eliminate. Identify cumulative effects to the employment market.*

**Determination:**
No Effect. The Project would not result in any new jobs nor eliminate any, therefore negative cumulative effects to the employment market are not expected.

**17. LOCAL AND STATE TAX BASE AND TAX REVENUES:**
*Estimate tax revenue the project would create or eliminate. Identify cumulative effects to taxes and revenue.*

**Revenues:**
See **Section 15** above.

**Determination:**
Effect, Beneficial Effect. The Project will add to the tax revenue, negative cumulative effects on taxes, and revenue are not expected.

**18. DEMAND FOR GOVERNMENT SERVICES:**
*Estimate increases in traffic and changes to traffic patterns. What changes would be needed to fire protection, police, schools, etc.? Identify cumulative effects of this and other projects on government services*

**Demand for Government Services:**
The Project is accessed by Midway Road West and Hawkeye Road. Additional government services (e.g. fire protection, police, schools, etc.) are not required for oil and gas production.

**Determination:**
No Effect. Future Project activities are not expected to impact traffic or increase the demand for government services. Therefore, the Project is not expected to have negative cumulative effects on government services.

**19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:**
*List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.*

**Determination:**
No Effect. The Project is in compliance with State laws and the Project will be permitted under lease # OG-43862-20.

**20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:**
*Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify cumulative effects to recreational and wilderness activities.*

**Legal Access and Recreation Opportunities:**
The A-4 and A-2 wells and State Tank Battery are located on legally accessible land via Midway Road West. Recreation potential consists of hunting.

**Determination:**
No Effect. The Project will not result in any new permanent impacts to the land, impact access, or recreational opportunities. The Project is not expected to have negative cumulative effects on recreational and wilderness activities.

**21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:**
*Estimate population changes and additional housing the project would require. Identify cumulative effects to population and housing.*

**Determination:**
No Effect. The Project will not require additional housing and is not expected to have negative cumulative effects on population and housing.

**22. SOCIAL STRUCTURES AND MORES:**
*Identify potential disruption of native or traditional lifestyles or communities.*

**Social Structures:**
The Project is located approximately 6.3 miles southeast of the New Miami Hutterite Colony and approximately 14.50 miles southeast of the Blackfeet Nation. No archeological sites were identified within the Project footprint.

**Determination:**
No Effect. The Project is consistent with the surrounding land use, therefore, negative cumulative effects on native or traditional lifestyles or communities are not expected.

**23. CULTURAL UNIQUENESS AND DIVERSITY:**
*How would the action affect any unique quality of the area?*

**Determination:**
No Effect. The Project will not result in any new activities to occur in the area and therefore it is not expected to have negative cumulative effects on the unique quality of the area.

**24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:**
*Estimate the return to the trust. Include appropriate economic analysis. Identify potential future uses for the analysis area other than existing management. Identify cumulative economic and social effects likely to occur as a result of the proposed action.*

The Project will benefit the Common Schools Trust in terms of compensation for an annual rental fee and oil production royalty fees for lease # OG-43862-20. The annual rental fee is $1.50/acre/year for years 1- 5, $2.75/acre/year for year 6, and $4.00/acre/year for years 7-10 with the acres being 640. The royalty rate is at 16.67% on the average production of the oil from producing the A-4 & A-2 wells for each calendar month. The Project will not impede the current surface production of lease # 4906 and residential lease # 5429.

Any future development in the area will likely be restricted to utility or mineral development, with minimal impacts to the surface. Future development of projects is not expected to have negative cumulative effects.

Comingling oil production from the A-4 & A-2 wells with private wells, through the installation of a flowline to the Kellogg Tank Battery, will allow production to come online more quickly, reduce ground disturbance and traffic on lease # 4906 and residential lease # 5429, and result in a longer production life for lease # OG-43862-20. In addition, the deconstruction of the State Tank Battery will reduce the potential for oil spills and increase the overall aesthetics of lease # 4906 and residential lease # 5429.

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| **EA Checklist Prepared By**: | **Name:** | Michaela Hanson | **Date:** | 10/15/2021 |
| | **Title:** | Land Use Specialist | | |

## V. FINDING

### 25. ALTERNATIVE SELECTED:

**Alternative B (Proposed Action):** Grant Balko permission to comingle oil production through the installation of a flowline and deconstruction of the State Tank Battery.

### 26. SIGNIFICANCE OF POTENTIAL IMPACTS:

No significant impacts are expected. A temporary disturbance will occur as a result of the proposed action, but it has been determined that the effects will not be cumulative or significantly adverse. Granting of the Project will benefit trust beneficiaries # OG-43862-20.

### 27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

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| ☐ | EIS | ☐ | More Detailed EA | ☒ | No Further Analysis |

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| **EA Checklist Approved By**: | **Name:** | Erik Eneboe |
| | **Title:** | Conrad Unit Manager, CLO |
| **Signature:**  | **Date**: | 10/20/21 |

Attachment A
Project Location Map